

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA)	
Plaintiff,)	
v.)	No. 18 CR 296
)	
)	Hon. Matthew F. Kennelly
DAVID SALGADO)	
Defendant.)	

DEFENDANT SALGADO's MOTION TO EXTEND BOP SURRENDER DATE

NOW COMES defendant DAVID SALGADO ("SALGADO"), by and through his attorney, MICHAEL J. PETRO, hereby requests that SALGADO be granted until January 8, 2020 to surrender to the BOP. In support of this Motion, SALGADO states as follows:

1. SALGADO is scheduled to surrender to the BOP on December 2, 2020. This Honorable Court sentenced SALGADO to 71 months.
2. As of this writing, SALGADO has not been designated a BOP institution to serve his sentence.
3. AUSA Sean Franzblau was contacted regarding this Motion. He stated that "the government is waiting to take a position on this motion until the government obtains information from the BOP regarding the reason for the delay."

WHEREFORE, for the reasons stated above, DAVID SALGADO respectfully requests that this Honorable Court grant him until January 8, 2020 to surrender to the BOP.

Respectfully submitted,

s/ Michael J. Petro

Attorney for DAVID SALGADO
20 North Clark Street, Suite 720
Chicago, IL 60602
(312) 913-1111

CERTIFICATE OF SERVICE

I, Michael J. Petro, an attorney, state that I caused to be filed by electronic filing (ECF) with the Clerk of the United States District Court for the Northern District of Illinois, the foregoing:

DEFENDANT SALGADO's MOTION TO EXTEND BOP SURRENDER DATE

The undersigned also certifies, as to the following parties, that in accordance with F.R.Civ.P. 5, LR 5.5 and the General Order on Electronic Case Filing (ECF), the foregoing pleading, along with a notice of motion if required, were served pursuant to the district court's ECF system on Tuesday, November 24, 2020.

Respectfully submitted,

s/ Michael J. Petro

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